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REMARKS

The undersigned notes with appreciation the courtesies afforded in the Examiner interview on May 5, 2004 and hereby requests reconsideration of this application.

In accord with the telephone interview, Applicants hereby submit this Request for Reconsideration to generally document the nature of the telephone discussion and the distinguishing features of the claimed invention. Applicants request reconsideration of the claims as they presently stand and believe these claims are allowable in their present form. Applicants also attach hereto alternate proposals of claim language which do not constitute a formal request for amendment of the claims but do propose a minor rewording of the claims to clarify that the wiring part is added to the insulating layer which distinctly differs from the method disclosed in Bennin and Horiuchi whether considered alone or in combination.

As to the claimed invention, independent Claims 1, 6 and 9 differ in scope but also contain common method steps. In all of these claims, a two-layer laminate is provided comprising an insulating layer and a metallic layer with a spring property. In one step of the claimed method, this step is defined as "forming a wiring part defined by a pattern of conductive material on another side of the insulating layer by the semi-additive method to add a third layer to the laminate". Hence, all of the independent claims initially start with a two-layer laminate to which is added a third layer, namely a wiring part defined by a pattern of conductive material.

Bennin distinctly differs. The first step of Bennin as defined in Column 7 Lines 4-10, involves providing a three-layer laminate. Hence, the initial material of Bennin comprises all three of the desired layers. Since the third layer which forms the electrical traces already exists as a

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stock material, it is necessary in the second step of Bennin to use an etching process to remove material from the conductive third layer. In other words, this conductive third layer exists as part of the initial three-layer laminate, and these conductive traces can only be formed by material removal.

Based on Applicants interpretation of the rejection as well as the telephone conference, it is believed that the fourth step of Bennin defined in Column 8, Lines 48-55 is cited as being the same as Applicants' step of forming a wiring part. This is not believed to be the case. The fourth step of Bennin is merely the addition of a plating to the pre-existing third layer of conductive materials, namely the electrical traces thereof. Hence, Bennin discloses forming the conductive traces by etching and then plating these existing electrical traces in selected areas thereof. Therefore, even if the plating step was performed by the semi-additive method of Horiuchi, this still does not constitute Applicants' claimed invention.

Since Applicants' claimed invention starts with a two-layer laminate, the wiring part defined by a pattern of conductive material is formed by the semi-additive method, rather than the etching step of Bennin. Bennin does not and would not disclose, teach or suggest forming a pattern of conductive material on the insulating layer by the semi-additive method since the conductive material layer 70 already exists in Bennin and the conductive traces must be formed by a material removal step.

Further, the plating material of Bennin is not being added "to another side of the insulating layer" as in Applicants' claimed step of forming a wiring part but rather the Bennin plating is being applied only to a side of the etched, conductive layer 70 of Bennin. Hence, Bennin only discloses plating the etched, conductive layer 70 while Applicants' claimed invention only forms a wiring part on the insulating layer.

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Additionally, Applicants' claimed invention does envision providing a plating material to the conductive material of the wiring part as defined in Claim 12. This plating is conducted in a fourth step defined in Claim 12, which claim depends from Claim 1. This plating is similar to the plating step defined in Bennin and thus distinguishes by claim differentiation that plating of a conductive material on a wiring part (Claim 12) differs from formation of a wiring part on the insulating layer (Claim 1).

As such, all of independent Claims 1, 6 and 9 are believed allowable in their present form.

However, Applicants also propose alternate language in the attached claims which may be found more suitable and desirable so as to facilitate allowance. Specifically, Applicants propose amending Claims 1, 6 and 9 to define the second step as "adding" a wiring part defined by a pattern of conductive material to another side of the insulating layer by the semi-additive method. This further emphasizes that the wiring part does not exist on the two-layer laminate until the semi-additive method is performed to add the wiring part to the insulating layer. Conversely in Bennin, the conductive layer 70 already exists as part of the initial three-layer laminate and thus the conductive traces are not added to an initial two-layer laminate, but as discussed above are formed by material removal from the existing conductive layer 70. This significantly differs from Applicant's claimed invention.

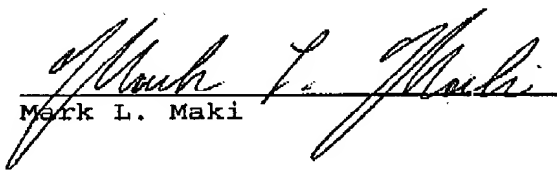
Further, Applicants note that the plating step in Column 8, Lines 48-55 is offered essentially as an option wherein Bennin states that the fourth manufacturing step "can" comprise plating selected areas wherein such plating "can" be applied on connector sites. The earlier steps of Bennin are defined positively as being performed while this fourth manufacturing step is only offered as being an option that "can" be provided. Hence, this language is believed to teach that plating may or may not be performed which therefore

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teaches that the conductive traces are complete when etched and the plating is merely an option.

Upon consideration of this Request, the undersigned requests further direct telephone communication from the Examiner to discuss the nature of the rejections in further detail or most preferably to advise Applicants that the claims are allowable either in their present form or through entry of the proposed amendments.

Respectfully submitted,


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Encl: Alternate Proposed Claims

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